

Michael Van Wies
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OFFICE OF THE
EXECUTIVE SECRETARY

June 23, 2002

Mr. Jonathan N. Wike, Hearing Officer
Mr. K. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
800-342-8359x171, (Jonathan N. Wike)
800-342-8359x142, (K. David Waddell)
Fax: 615-741-5015

VIA FACSIMILE & FedEx:

Re: Docket No. 02-00058

RESPONSE FOR MOTION TO COMPEL:

Dear Mr. Wike & Mr. Waddell;

At this time I am asking you to deny CenturyTel's "MOTION TO COMPEL". I have provided answers to Discovery, to the best of my ability for the items that pertain to the case. I am also dropping all complaints other than quality of service issues. There were many questions asked in discovery of a personal and private nature that has no bearing on the case, however if Mr. Wike deems it germane I will provide the answers.

For example, They are inquiring whom I work for, and my supervisor's name. I am concerned that they may cause problems at work, if they have this knowledge.

In response to Paragraph #3 in CenturyTel's Motion to Compel:

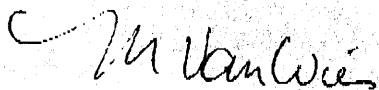
At this time, to expedite this case, I am withdrawing all items in our complaint except #6, see attachment #1. "Motion to Dismiss" letter dated March 1, 2002

In response to CenturyTel, Petitioner is not disabled. As for my motive, It was made clear to CenturyTel on June 16, 2002. See attachment #2, Letter dated June 16, 2002, which is enclosed, Re: Discovery Response. "As for my intentions let me make them clear. I intend to force CenturyTel to provide the services that they are required to provide by the Tennessee Regulatory Authority..."

In response to Paragraph #7 in CenturyTel's Motion to Compel:

I have answered this to the best of my knowledge. See Attachment #2, page #1, Interrogatory #7. I have discussed a contract to interpret the data and testify at this hearing with JMR Technical Services. As the Discovery data has not been provided, I have not yet entered into a contract with them. I do not feel I should be obligated to contract with them to provide the information CenturyTel has requested. When and if CenturyTel complies with Discovery for this information and I enter into a contract with JMR Technical Services, the Discovery information for CenturyTel can be provided by JMR Technical Services.

Yours truly,



Michael Van Wies

cc: R. Dale Grimes & Ross Booher, Attorney for CenturyTel, Bass, Berry, & Sims PLC
Fax: 615-742-0450

Attachment #1

Michael Van Wies
8504 Horseshoe Bend Lane
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March 1, 2002

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
800-342-8359x142

Re: Docket No. 02-00058

Dear Mr. Waddell:

In reference to CenturyTel's MOTION TO DISMISS, I would like to respond to their items, Numbers-1, 2, & 6.

Items No. 1 & 2:

Their claim that the allegation is demonstrably FALSE is incorrect. Their claim that they have offered REPEAT DIAL, and CALL RETURN since July 2, 2001 in FALSE. These features did not work as late as January 2002. Upon receipt of THE MOTION TO DISMISS we tried the features at my home and they are currently working.

Item No. 6:

I feel that their claim that "completion of 97% of local dialed calls without encountering an equipment busy condition (blockage)" in FALSE based on my experiences. CenturyTel says "that they have not experienced any recent trunk blockages", would imply that they have had them in the past.

Because of this, we are filing for a **MOTION FOR DISCOVERY** for the above three items.

In specific for items #1, & 2, we want CenturyTel to provide for the Tennessee Regulatory Authority the date that the "RECENT CHANGE MESSAGES" were input to their DMS-100 switch to activate these features for public use basis.

In regard to item #6, we want CenturyTel to provide the Tennessee Regulatory Authority, with "TRUNK OVERFLOW DATA FOR THE CHATTANOOGA TANDEM TRUNK GROUP", during PEAK TRAFFIC PERIODS. CenturyTel has stated that they have not experienced any recent trunk blockages, which violate TRA call completion rate standards, this would imply that they have violated these standards in the past. As per TRA Rule 1220-4-2-.34(4)(requiring quarterly formal reports and **ADDITIONAL REPORTS WHEN SURVEILLANCE REVEALS SERVICE PROBLEMS**). We want CenturyTel to produce for us, the DMS-100 switch data used to compile the quarterly report for THIRD QUARTER (JULY, AUGUST & SEPTEMBER) 2001, and a copy of

Attachment #1

the corresponding report as provided to the TRA. My experience during this period was an abnormally high call failure rate. I would also like data as to when and if any additional reports were filed due to service problems.

Yours truly,



Michael Van Wies

cc: Rhonda Lien, Federal Communications Commission-Common Carrier Bureau
Jo D. Nall, United States Department Of Agriculture-Rural Utilities Service
R. Dale Grimes, Attorney for CenturyTel, Bass, Berry, & Sims PLC

Attachment #2

Michael VanWies
8504 Horseshoe Bend Lane
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June 16, 2002

VIA FACSIMILE & REGULAR MAIL:

Docket No. 02-00058

Re: Discovery Response

Ross Booher & Dale Grimes
Bass, Berry & Sims PLC
Amsouth Center
315 Deaderick Street, Suite 2700
Nashville, TN 37238-3001
Tel: 615-742-6200
Fax: 615-742-0450
Fax: 615-742-2744

Gentlemen:

In response to your letter of 6/14/02:

Interrogatory #1, 2,3,4 all answered previously to the best of my ability at this time.

Interrogatory #5, 6 all answered previously to the best of my ability at this time.

Interrogatory #7, I have contracted with JMR Technical Services, to review and interpret the data that CenturyTel has failed to provide to this point. I am under no obligation to provide you with any more information at my expense, due to the fact that you have failed to provide the discovery evidence. I have not yet entered into a contract with JMR Technical Services. You are free to contact JMR Technical Services for any information that you require.

Interrogatory #8,9 all answered previously to the best of my ability at this time.

Interrogatory #11 has been answered previously to the best of my ability at this time.

Interrogatory #12 is not applicable to this case as previously answered.

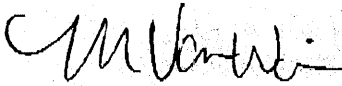
Interrogatory #13 has been answered previously to the best of my ability at this time.

at the meeting

Both CenturyTel and myself are free to take whatever legal actions they deem appropriate.

As for my intentions let me make them clear. I intend to force CenturyTel to provide the services that they are required to provide by the Tennessee Regulatory Authority. This includes but is not limited to the following: I intend to pursue the failure of CenturyTel to maintain and provide required records in every state in which they do business and at the Federal level. Furthermore, I have already contacted the State of Tennessee's Attorney General's Office and the Federal Communications Commission, regarding the destruction of required records. I will also be in contact with the Securities and Exchange Commission, and the United States Attorney General's Office, Telecomm Unit concerning the destruction of evidence.

Yours truly,



Michael VanWies

cc: K. David Waddell
Jonathan N. Wike